

[Throughout this template, both instructions and fields for licensee specific information are presented in brackets.

- Green brackets designate fields to fill in
- Blue brackets designate instructions
- All bracketed text should be removed prior to submission
- It is recommended that non-bracketed text not be removed]

[Attachment or Enclosure]

[Licensee]’s [First or sequential number] Six Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

1 Introduction

[Licensee] developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan [for future status reports, this will read “the last status report”], including any changes to the compliance method, schedule, or need for relief and the basis, if any.

2 Milestone Accomplishments [required by NEI 12-06 Section 13.2]

[Milestone accomplishments are completion of items included in Attachment 2 of the Overall Integrated Plan.]

The following milestone(s) have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of [site specific closure date to permit internal submittal review, for example July 30, 2013 for the first status report].

[Subsequent reports: “The following milestone(s) have been completed since [site specific date provided in previous status report], and are current as of [site specific closure date to permit internal submittal review].”]

- [A brief statement summarizing accomplishment]
- [A brief statement summarizing accomplishment]
- [A brief statement summarizing accomplishment]

[OR]

None

3 Milestone Schedule Status [required by NEI 12-06 Section 13.2]

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

[Licensee]’s [First or sequential number] Six Month Status Report for the Implementation of FLEX
[Date]

[If there are changes to target completion dates, use one of the following statements to explain the impact of these changes.]

The revised milestone target completion dates to not impact the order implementation date.

[OR]

The revised target completion dates impact the order implementation date. An explanation of the impact of these changes is provided in Section 5 of this [attachment or enclosure].

[Include an update to Attachment 2 of the Overall Integrated Plan or a table representative of Attachment 2. Dates provided in the Overall Integrated Plan or last status report should be given as “Target Completion Date” and any changes to these dates should be provided in “Revised Target Completion Date.” Suggested activity statuses are not started, started, and complete. The following table provides an example, but other methods to present the information are acceptable.]

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Not Started	
Update 3	Aug 2014	Not Started	
Update 4	Feb 2015	Not Started	
Update 5	Aug 2015	Not Started	
Update 6	Feb 2016	Not Started	
Update 7	Aug 2016	Not Started	
FLEX Strategy Evaluation	Date	Started	
Perform Staffing Analysis	Date	Status	
Modifications:			
Modifications Evaluation	Date	Status	
Unit 1 Design Engineering	Date	Status	
Unit 1 Implementation Outage	Date	Status	
Unit 2 Design Engineering	Date	Status	
Unit 2 Implementation Outage	Date	Status	
Storage:			

[Licensee]’s [First or sequential number] Six Month Status Report for the Implementation of FLEX
[Date]

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Storage Design Engineering	Date	Status	
Storage Implementation	Date	Status	
FLEX Equipment:			
Procure On-Site Equipment	Date	Status	
Develop Strategies with RRC	Date	Status	
Install Off-Site Delivery Station (if Necessary)	Date	Status	
Procedures:			
PWROG issues NSSS-specific guidelines	Date	Status	
Create Site-Specific FSGs	Date	Status	
Create Maintenance Procedures	Date	Status	
Training:			
Develop Training Plan	Date	Status	
Training Complete	Date	Status	
Unit 1 FLEX Implementation	Date	Status	
Unit 2 FLEX Implementation	Date	Status	
Full Site FLEX Implementation	Date	Status	
Submit Completion Report	Date	Status	

4 Changes to Compliance Method [required by NEI 12-06 Section 13.2]

[This section is intended to document any changes to the compliance method with NEI 12-06 and any exceptions identified in the Licensee’s Overall Integrated Plan.]

[If there are changes to the compliance method that meet NEI 12-06, but are changes to the information provided in the Licensee’s Overall Integrated Plan, describe the changes.]

[Describe changes and justification.]

[If there are changes to the compliance method that are alternatives to NEI 12-06 but still meet order EA-12-049, describe the changes. The justification for these alternatives should be communicated to the NRC under separate cover on an expedited basis. The changes may also be communicated in the six month updates if the updates communicate the information in a timely manner.]

[Describe changes and justification.]

[If there are no changes, the following text should be used.]

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1).

5 Need for Relief and Basis for the Relief [required by NEI 12-06 Section 13.2]

[This section is intended to document any need for relief from order EA-12-049.]

[If there is not a required need for relief use the following words.]

[Licensee] expects to comply with the order implementation date and no relief is required at this time.

[If relief is required, documentation should be provided to the NRC describing the need for relief under separate cover and then summarized in this section.]

[Describe the needed relief and the basis for this relief.]

This section provides a summary of needed relief only. The specific details [will be or have been] submitted in a separate document, [site specific reference].

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation [not required by NEI 12-06 Section 13.2, but will be included in the initial draft]

[Provide an update on the progress made on any open items provided in the Overall Integrated Plan and open items included in the draft SE. Each included open item should have a status such as not started, started or complete, where complete means that Licensee actions are complete. At the time an open item is determined to be complete, a summary (including a level of detail appropriate to the item, e.g., the level of detail that would have been used had the open item been closed in the Overall Integrated Plan) of the results used to close the item should be included.]

[If open items were provided in the Overall Integrated Plan or have been received as a part of the draft SE, use the following text.]

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

Overall Integrated Plan Open Item	Status
[Open item number and text]	[Status on progress toward completion of open item]

Draft Safety Evaluation Open Item	Status
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[Open item number and text]	[Status on progress toward completion of open item]

[If open items were not provided in the Overall Integrated Plan or have not been received as a part of the draft SE, use the following text.]

None.

7 Potential Draft Safety Evaluation Impacts [not required by NEI 12-06 Section 13.2, but need to be included if the cover letter includes these impacts]

[Provide a summary of the updates described above that impact a specific portion of the draft SE and consider providing suggested wording for the SE. Continuity should be present between this section and Sections 4, 5 and 6.]

[If the draft SE has not been received or if no impacts have been identified, use the following text.]

There are no potential impacts to the Draft Safety Evaluation identified at this time.

8 References

The following references support the updates to the Overall Integrated Plan described in this [attachment or enclosure].

1. [Licensee]'s Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049),” dated [Licensee specific date].
2. NRC Order Number EA-12-049, “Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events,” dated March 12, 2012.
3. [Additional references to support the progress made on implementation of FLEX as summarized in this attachment. Examples include documentation to support closure of open items and information to support the basis for relief.]